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PD

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia, DIVISION

JAMES T. COLE, JR.

REG NO. 41167-066

James T. Cole, Jr.  
(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

vs.

Case No: 18 3668  
(To be supplied by the Clerk of this Court)

Rodney "Frog" Carson

T.M.G. Publishing Firm,

Amazon Inc and/or Corp.

Amazon Inc and/or Corp.  
\_\_\_\_\_  
\_\_\_\_\_  
(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**

       COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)

       COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331(a) U.S. Code (federal defendants)

  xx   OTHER (cite statute, if known) Diversity Of Citizenship 28 USC §1332

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: James T. Cole, Jr Reg No. 41167-066
- B. List all aliases: n/a
- C. Prisoner identification number: Reg No. 41167-066
- D. Place of present confinement: U.S.P. Atlanta
- E. Address: P.O. Box 150160 Atlanta, Ga. 30315

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Rodney "Frog" Carson
- Title: Author of "Fall Of The J.B.M."
- Place of Employment: Federal Witness Program(Unknown) U.S. Marshal
- B. Defendant: T.M.G. Publishing Firm ,
- Title: Publisher Of "Fall Of The J.B.M."
- Place of Employment: 122 W. 34th St. New York, NY. 10120
- C. Defendant: Amazon Corporation
- Title: Distribution Of "Fall Of The J.B.M."
- Place of Employment: 410 Terry Ave. N. Seattle, WA. 98109

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

X

**III. Exhaustion of Administrative Remedies**

You are required to exhaust all your available administrative remedies before bringing an action in federal court.

A. Is there a grievance procedure available at your institution?

YES ( ) NO ( ☒ ) If there is no grievance procedure, skip to F. **n/a**

B. Have you filed a grievance concerning the facts in this complaint?

YES ( ) NO ( )

C. If your answer is **YES**:

1. What steps did you take?

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2. What was the result?

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3. If the grievance was not resolved to your satisfaction, did you appeal?

What was the result (if there was no procedure for appeal, so state.)

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D. If your answer is **NO**, explain why not:

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E. Is the grievance procedure now completed? YES ( ) NO ( )

F. If there is no grievance procedure in the institution, did you complain to authorities? YES (xx) NO ( )

G. If your answer is YES:

1. What steps did you take?

n/a

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---

2. What was the result?

n/a

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---

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H. If your answer is NO, explain why not:

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**IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court**

A. Name of case and docket number: Cole vs- Ferranti, 4:10-cv-00426

B. Approximate date of filing lawsuit: March/2010

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: \_\_\_\_\_

Seth Ferranti(author)

Gorilla Publishing

D. List all defendants: see above

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): M.D. Pennsylvania

F. Name of judge to whom case was assigned: Judge Smyer/Jones

"Diversity"

G. Basic claim made: Divisity Of Citizenship (Controversy)  
Book "Street Legends" Defamation Claim

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Loss Third Circuit Court Of Appeals  
(CA3) 532 Fed Appx 205 (3rd Cir 2013).

H. Approximate date of disposition: 2013)

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**

**V. Statement of Claim:**

State here as briefly as possible the facts of your case. Describe precisely how each defendant is involved. Include also the names of other persons involved, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

The fact of the matter, I was convicted in E.D. Pennsylvania  
a couple of decades ago of being a member of a corrupt organization  
known as the Junior Black Mafia(JBM). However, I was convicted based  
upon lies, lies and lies not the truth. Now the defendant, "Rodney Carson  
alleges that he is writing a non-fiction book about his lies. There is  
no truth to his book. He should not profit from lies. And he knows it.  
Rodney Carson wants to defame my Charater. The other defendant are just  
doing a public servant and T.M.G. Publishing, as well as Amazon Distribution.

Another factor, I still have pending litigation available in federal  
Court in the EASTERN District Of Pennsylvania and that will give Mr Carson  
a techical advantage if a trial become see, U.S.-vs- Cole, 2:14-cv-02987\_  
28 USC §2255, denied however the appeal ( was a interlogutory appeal).

CA NO 15-1641

(1) He Mr Carson was paid \$4,000 by the gov't for his testimony as lease that is whta we thought. He hid that his family was paid over \$200,000 dollars in a three(3) time frame, another reason to lie on Cole.

He, Mr Carson went to a grand jury lying that we, Carson, Davis, Aaron Jones was all in a meeting discussing drug prices. However at my trial, he Mr Carson testified to something completely different. He now allges to a jury. he only saw Cole as he was comming to Mr Jones Mother house, This was used in his closing arguments to boast his credibility which he has none. Mr Carson never knew Cole and never heard of Cole.

I did not deserve a life sentence on Lies. They used his testimony at my sentencing to make me a organizer of the JBM.

This Mr Carson is a bad dude and now he wants money, on lies and I am in the processing of forming a substantial question for this court, to determine whether a known liar. can make a non-friction book and their is documentation, demostrating tthe auther is lying what legal endeavor should the court take in a case like that????????????????????????????????

**VI. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments.  
Cite no cases or statutes.

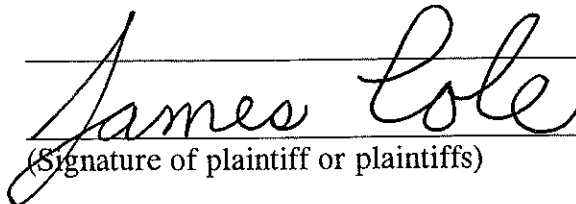
I want the court to put a **"injunction"** on the book until the  
the outcome of all litigation, with regards to the name **Junior Black**  
**mafia** is termination and/or hold an evidentiary hearing on the Matter,  
because lives are involve and this is not a **Joke**.

a. Carson pay, \$1,000,000 (2) T.M.G pay \$1,000,000  
(3) AMAZON, pay \$1,000,000 each defendant  
or trial by JURY.

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this  
Complaint are true to the best of my knowledge, information  
and belief. I understand that if this certification is not correct,  
I may be subject to sanctions by the Court.

Signed this 23th day of August, 2018.



(Signature of plaintiff or plaintiffs)

**James T. Cole Jr.**

(Print name)

**28 USC 1746**

(I.D. Number)

**Reg No 41167-066**

**P.O. Box 150160**

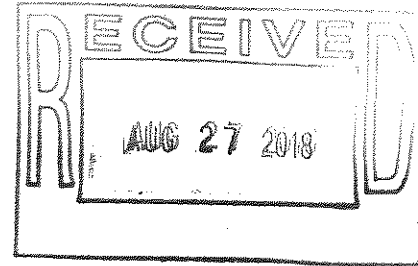
**Atlanta, Ga. 30315**

(Address)



August 23, 2018

James T. Cole, Jr  
Reg No, 41167-066  
FCI Atlanta  
P.O. Box 150160  
Atlanta, Ga. 30315



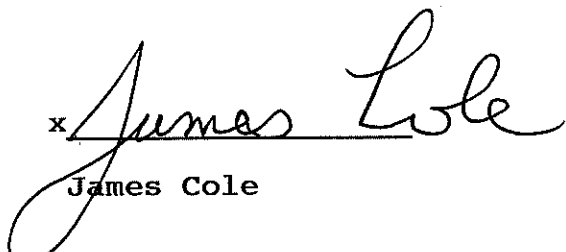
Clerk  
U.S. Courts  
E.D. Pennsylvania  
601 Market Sts  
Phila. Pa. 19106

Re: Defamation Of Charater  
[Divirsity Of Citizenship]

Dear Clerk

I cannot fine the other firm you sent so will the enclosed one do. I will be looking for it and if find I will submit and if this will not do, sent anothe firm.

The defendant, from Street Sources book is comming out in October/2018. The street are talking .

x   
James Cole

*Exhibit in support*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
-----

UNITED STATES OF AMERICA, )  
Plaintiff, )  
Criminal Action  
vs. ) No. 91-570-25  
RODNEY CARSON, )  
a/k/a "Frog", )  
Defendant, )

TRANSCRIPT OF PROCEEDINGS

of sentence hearing held in the above-entitled  
action on Tuesday, March 10, 1993 by the  
Honorable Marvin Katz, District Judge.

APPEARANCES:

For the Government:

U. S. Attorney's Office  
615 Chestnut Street, Suite 1250  
Philadelphia, Pa. 19106-1797  
By: Allison Burroughs, Esq., AUSA  
Joel Friedman, Esq., AUSA  
Abigail Simkus, Esq., AUSA

For the Defendant:

Robert Marano, Esq.  
Suite 450, The Curtis Center  
Philadelphia, Pa. 19106

Also present: Joel Rosen, Esq., Assistant District  
Attorney

-----  
Florence Jones

Official Reporter

Proceedings recorded by mechanical stenography, transcript  
produced by computer-aided transcription.  
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1 charged.

2 Your Honor, at the time of Rodney Carson came in  
3 almost right from the beginning, virtually right in the  
4 beginning he gave detailed information about members of  
5 the JBM.

6 It would not be an overstatement to say that  
7 Rodney Carson dealt only the JBM organization. He'd been  
8 with the organization a long time through the Spring of  
9 1991 when he withdrew from the organization. He provided  
10 detailed information about the membership and meetings,  
11 the acts of violence, the drug dealing of the organization  
12 from late 1985 straight through up to 1991.

13 Although Rodney Carson was a member of this  
14 organization for a very long time and disclosed a good  
15 deal of information about JBM-related violence, he never  
16 participated in any of the JBM-related violence although  
17 he was present at meetings where those things were  
18 arranged. X

19 During the course of his cooperation, Your  
20 Honor, he testified in the two <sup>three</sup> JBM trials before Your  
21 Honor which I'm sure Your Honor recalls. He was prepared  
22 to testify in the third trial as well although that  
23 ultimately proved unnecessary.

24 In addition to those two testimonies, he was  
25 prepared to testify a third time. He also appeared before

90000 SERIES



U.S. Department of Justice  
United States Attorney  
Eastern District of Pennsylvania

615 Chestnut Street  
Suite 1250  
Philadelphia, Pennsylvania 19106-4476  
(215) 451-5200

June 3, 1993

Doreen Bennett  
Security Specialist  
Office of Enforcement Operations  
P.O. Box 7600  
Ben Franklin Station  
Washington, D.C. 20044-7600

*Bob Marano*  
*923-0133*  
*The Curtis Center*  
*Suite 450*  
*Indisposed*  
*Phil 1916*

Dear Ms. Bennett:

I am writing as per our recent conference call, which involved you, me and Special Agent Jesse Coleman of the Federal Bureau of investigation, and concerned Rodney Carson.

I believe, and Special Agent Coleman concurs, that Rodney Carson will need additional services from the Witness Protection Program following his release from custody. His current federal release date is June 8, 1993. As you know, his federal and state plea agreements intended that his state and federal sentences run concurrently and coterminously. It is my understanding that the state court judge was going to sign an order yesterday afternoon, which would allow the state sentence to terminate at the same time as the federal sentence. I will advise you by phone once I have confirmed that the order was signed.

During our conversation yesterday afternoon, we discussed Rodney Carson and statements that he allegedly made during a psychological examination concerning past violent conduct. Jesse Coleman also spoke with Rodney Carson following our conference call. Rodney Carson was a member of a very violent drug trafficking organization in Philadelphia. This group primarily relied on the use of firearms to achieve their violent ends and further their drug business. Throughout his affiliation with this drug trafficking organization, Carson remained relatively removed from the violence perpetrated by the organization, by which I mean

*ll* *lie*

Lie  
↑

that he never killed anyone, nor directed that anyone else kill someone. Special Agent Coleman confirmed with Carson that he had never ordered a contract killing. If information to the contrary is included in Carson's psychological examination, it reflects a misunderstanding between Rodney and the examiner. ←


When Special Agent Coleman and I represented in our threat and risk assessments that Carson had not engaged in violent conduct, we were referring to JBM related murders and the use of firearms. We are aware that Rodney participated in a prison aggravated assault, ← at the direction of JBM leader Aaron Jones, and that this assault resulted in the victim being rendered unconscious for a brief period. Carson pled guilty to his role in this offense as part of his state plea agreement. To our knowledge, no permanent harm was done to the victim, nor was he ever in a coma. Carson also engaged in fist fights which was a routine part of his life in Philadelphia as a gang member.

Again, to reiterate, Special Agent Coleman and I do not believe that Carson would pose a significant risk of danger to the community should he be released from prison and continue his participation in the Program.

Thank you for time and attention to this matter. Please let me know if I can provide you with any further information.

Sincerely yours,

JOEL M. FRIEDMAN  
Assistant United States Attorney  
Chief, Organized Crime Division

  
ALLISON D. BURROUGHS  
Assistant United States Attorney

↑

Call  
him  
by  
first  
NAME.

by Rodney Carson

## SHOOTINGS & MURDERS

COLUMBREAU (VICTIM): WILLIAM "QUIET STORM" PELDUE (SHOOTER), SHAWN "CH-4A" HALL (PARTNER), LOCATION 55TH VONGES ST. BETWEEN CHESTER AVE. AND LINDBERGH AVE. ORDER BY LEROY DAVIS, REASON: DISRESPECT, STEALING DRUGS.

DEAD TELLY CANNON WAS THE INTENDED PERSON.

ARTHUR WILEY (COOS) ~~IS~~ VICTIM: JAMES "JIMMY MAC" HENDERSON. AFTER NUMEROUS ATTEMPTS BY STANLEY "SUG" HAYES, WILLIAM "QUIET STORM" PELDUE LOCATION - CHETA PARKS APARTMENT AT 82ND LINDBERGH BLVD. REASON: STEALING DRUGS.

DEAD

~~SEAN~~ LONLEY "LAST NAME UNKNOWN" (VICTIM): WILLIAM "QUIET STORM" PELDUE, JAMES "MONT" ALEXANDER, JERREK "BOLO" ALLEN, AND SEVERAL OTHERS, REASON: DRUG COMPETITION, LOCATION 58TH GREENWAY AVE. PALACEER.

DAVIN HENLY "BQ BAVE" (VICTIM): AARON JONES, RONALD MASON, MELVIN BROOKS, BERNARD GIELDS AND OTHERS, REASON: DRUG COMPETITION, LOCATION 49TH KAYS FERRY AVE. GAS STATION (AAMCO). SURVIVED.

DAVIN HENLY (VICTIM): JERREK "BOLO" ALLEN, WILLIAM PELDUE. ~~SOMEONE~~ (COCA) 58TH GREENWAY AVE. SURVIVED.

MELVIN "BLACK MEL" BROOKS (VICTIM): STANLEY HAYES. REASON: STOLE MONEY. LOCATION: 60TH CHESTER AVE. ORDERED BY LEROY DAVIS.

ANDRAE "CLINT" (VICTIM): STANLEY HAYES, JERREK ~~SA~~ "Q" STEPLIGHT: FORT TING AT SHAN HENDERSON LOCATION: 57TH GREENWAY AVE. SURVIVED.

5. JUNE "AT CAPONE" BARBER SHOP DAYS - WILLIAM PELDUE, JAMES ALEXANDER KNOX, THE SHOOTERS WERE WILLIAM PELDUE, JAMES ALEXANDER. NO SHOT BACKED LOCATION 58TH KATHY BLVD. SURVIVED.

RODNEY CARSON



TERAN HENRY (VICTIM): GREG (SHOOTER), RODNEY CARSON (SHOOTER). AFTER  
 SEVERAL UNSUCCESSFUL ATTEMPTS BY ME AND MELVIN DAVIS, WE AND CHA  
 "BLACK" ASSAULT. REASON: BECAUSE HIS BROTHER DAVIS STABBED KEVIN BOW  
 IN HOLMESBURG PRISON. LOCATION: IN FRONT OF HIS HOUSE ON CECIL ST  
 THIRTEEN 58TH GREENHAWAY AVE AND 68TH UNLAWFULLY ORDER BY AARON JONES  
 (YAN THORNTON). SURVIVED.

his own admission involved

hits + murders

(prosecutor knew)



*Prosecution Memorandum*

Anthony Fletcher by people believed by the JBM to be associated with Craig Haynes, AARON JONES called a meeting of a number of JBM members. JONES stated that he had a source who would tell him when Haynes was at a particular location in South Philadelphia. He further stated that he was going to use Dirty Black (CHRISTOPHER LASTER) and WILL PERDUE to kill Haynes. JONES then ordered LASTER and PERDUE to go to 24th and Moore to kill Haynes. LASTER and PERDUE returned later and stated that Haynes had not been at 24th and Moore, but they started shooting anyway and they knew that they had killed somebody (victim determined by police to be Willie BOWMAN - shot 7/11/89).

AARON JONES and BRYAN THORNTON discussed in CARSON's presence the fact that they along with SAM BROWN had shot and attempted to kill Richard Isaacs because he had refused to buy his drugs from the JBM.

During the fall of 1989, at the direction of AARON JONES, CARSON and DIRTY BLACK (CHRISTOPHER LASTER) go to the vicinity of 28th and Cecil Streets for the purpose of shooting Stefan Henry. Henry did not appear that night and thus was not shot on this occasion. (*prosecutor knew CARSON involved in murders*)

## 2. Dwight Sutton

In 1987 for approximately one month he operated a crack house for AARON JONES and LEONARD PATTERSON. On some occasions Sutton would obtain the crack capsules from PATTERSON and transport them to the house from which he would sell them or supervise their sale. Sutton made eight trips to Florida on behalf of the JBM to purchase and transport cocaine back to Philadelphia. While in Florida on one of those trips in June of 1987, AARON JONES travelled to Florida to resolve a problem that had arisen involving the drug money. On various occasions he would hear discussions about drug business between AARON JONES, LEONARD PATTERSON, KEVIN BOWMAN, REGINALD REEVES and SAM BROWN. Usually, upon returning from Florida, Sutton would deliver the cocaine to AARON JONES, LEONARD PATTERSON, KEVIN BOWMAN, JAMES PRICE and SAM BROWN.

## 3. Andre Crews

Knows JONES to be the head of the JBM, and has heard him give orders to members. In the summer of 1988, Crews attended a meeting with AARON JONES, BERNARD FIELDS, and SAM BROWN. They attempted to persuade him to buy cocaine from them by offering to front it, and by offering it at a better price than he was then paying. Subsequent to this meeting, Crews got word on the street that if he didn't start buying from the JBM, he would be hurt. He was then contacted by BERNARD FIELDS and told to attend a second meeting. The second meeting was attended by AARON JONES, BERNARD FIELDS, REGINALD REEVES, BRYAN THORNTON,



## REPORT OF INVESTIGATION

Page 1 of 3

1. PROGRAM CODE	2. CROSS FILE	RELATED FILES	3. FILE NO. CK-89-Z004	4. G-DEP IDENTIFIER FN2-C1
BY: S/A Charles Allen AT: Philadelphia FD	<input type="checkbox"/>	SCP-90-0004	5. FILE TITLE Aaron JONES	
	<input type="checkbox"/>	CK 88 Z005		
7. <input type="checkbox"/> Closed <input type="checkbox"/> Requested Action Completed <input type="checkbox"/> Action Requested By:	<input type="checkbox"/>		8. DATE PREPARED January 22, 1990	
9. OTHER OFFICERS: S/A James Fitzgerald, Trp. Bruce Peachey Delaware State PD, Ofc. Dan Daley New Castle PD and Ofc. William Sullivan Wilmington PD				
10. REPORT RE: INITIAL DEBRIEFING SCP-90-0004				

## DRUG RELATED INFORMATION:

- On 01/16/90, at approximately 11:30 AM, S/A Charles Allen debriefed SCP-90-0004 at a prearranged location in the greater Philadelphia area relative to the drug trafficking activities of known and suspected JBM members in and around Wilmington Delaware.
- SCP-90-0004 stated that he/she knew reputed JBM members Rodney CARSON (aka "FROG"), Derrick STEPLIGHT (aka "Q"), Melvin DAVIS (aka "MEL") and Leroy DAVIS (aka "BUCKY"). SCP-90-0004 says that his/her association with these individuals began in 1987 when he/she served in the Navy with Rodney CARSON. According to SCP-90-0004, CARSON was being discharged from the service at this time for narcotics violations. He (CARSON) told SCP-90-0004, "when you get out, look me up." *He testified Re West AWO*
- SCP-90-0004 stated that on his/her release from the NAVY (also in 1987), he/she took to hanging out with CARSON at a house located on Creighton Street in West Philadelphia which is said to belong to Leroy DAVIS. SCP-90-0004 described the location as a cut house and drug distribution point, Leroy DAVIS is said to have favored this house as a place to relax. SCP-90-0004 says that a short time after he/she began frequenting Creighton Street, he/she also became a small time narcotics (cocaine) trafficker, buying and selling ounce quantities. SCP-90-0004 further stated that he/she would purchase the cocaine from Bucky DAVIS at \$700 per ounce eventually working his/her way up to 10 (ten) ounce transactions.
- SCP-90-0004 says that between them, Rodney CARSON and Will PERDUE (aka "STORM") were moving approximately 2 (two) kilograms of cocaine a week out of Creighton Street. SCP-90-0004 estimated that BUCKY would have been moving (selling) at least twice that amount. SCP-90-0004 says that BUCKY currently utilizes Melvin DAVIS as a house sitter in his absence.

11. DISTRIBUTION:	12. SIGNATURE (Agent)	13. DATE
REGION	<i>Charles Allen</i>	2/5/90
DISTRICT	Special Agent Charles Allen	
OTHER AMRI, DIO, OCD	14. APPROVED (Name and Title)	15. DATE
	<i>Martin W. Pracht</i>	2/5/90
	Acting G/S Martin Pracht	

DEA Form - 8  
(May 1988)DEA SENSITIVE  
DRUG ENFORCEMENT ADMINISTRATION

This report is the property of the Drug Enforcement Administration.  
Neither it nor its contents may be disseminated outside the agency to which loaned.  
Previous edition may be used.

# REPORT OF INVESTIGATION (Continuation)

CK-89-7004  
3. FILE TITLE

FN2-C1

Aaron JONES

Page 2 of 3

6. DATE PREPARED

January 22, 1990

PROGRAM CODE

5. SCP-90-0004 says that the Elsmire Skating Rink in Wilmington, Delaware was a major hangout spot for all young (20-30 YOA) area hustlers on Sundays until it was recently closed for renovations. SCP-90-0004 says that this crowd has relocated to the Franklinville New Jersey Skating Rink since the close. SCP-90-0004 describes Will PERDUE and the aforementioned individuals from paragraph #2 as regulars.

6. SCP-90-0004 says that Bucky DAVIS, Rodney CARSON and Will PERDUE are seeking to expand their narcotics operation into Wilmington. They have been persistent (per SCP-90-0004) in their efforts to get SCP-90-0004 to lease an apartment for them so that they can have a proper shop or base of operations. SCP-90-0004 says that he/she presently has them on hold.

7. SCP-90-0004 says that he/she can make a buy from Rodney CARSON and that the introduction of a undercover for that purpose should be fairly easy. SCP-90-0004 feels that a transaction of less than \$5000 would probably be turned down by CARSON, SCP-90-0004 also feels that in the initial phases of the deal, Melvin DAVIS would act as a go between. Per SCP-90-0004 ounces are now selling for between \$950 and \$1200.00.

8. SCP-90-0004 says that he/she frequently sees Alfonso CALDWELL driving Rodney CARSON's car (white later modeled 740 Volvo 740 State Wagon). CALDWELL (aka "FONNY") figures prominently in the Frank SAUNDER's investigation which at present is centered in Chester, PA, he is a millionaire and has been in the narcotics trade since the age of 14. SCP-90-0004 says that he/she saw Will PERDUE riding in the car with CALDWELL last week.

## NON-DRUG RELATED INFORMATION:

1. SCP-90-0004 stated that Terrance GOSS aka "PAPERS" was shot at Rodney CARSON's instigation. GOSS, who was a member of the CRAIG HAYNES DRUG TRAFFICKING ORGANIZATION was shot nine times in front of Cahoots Disco (Airport Hilton, Phila.) which resulted in an execution attempt on Leroy DAVIS aka BUCKY the next day by members of HAYNE's faction. This took place circa February 2 and 3, 1989.

2. SCP-90-0004 further stated May 1989 Willie CHASE was found shot to death along with three other Philadelphia area males. Bodies of the four were found shot execution style in a later model Volvo somewhere in Virginia (?). Per SCP-90-0004 this was a JBM sanctioned hit because one of these individuals had made a flagrant show of not paying back drug money owed to Leroy DAVIS and Rodney CARSON.

## MONEY LAUNDERING:

1. None to report.

MS Borroughs  
had information

1 UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3  
4 BEFORE THE FEDERAL GRAND JURY  
5  
6

7 Stenographic transcript of  
8 proceeding and evidence presented before the  
9 Federal Grand Jury of the United States District  
10 Court for the Eastern District of Pennsylvania,  
11 601 Market Street, Room 4716, Independence Mall  
12 West, Philadelphia, Pennsylvania, 19106 on  
13 Wednesday, March 13, 1991, commencing at 2:13  
14 p.m., before Joanne D. Jardiniano, Court  
15 Reporter-Notary Public there being present.  
16  
17

18 TESTIMONY OF: RODNEY CARSON

19 PRESENT:

20 ALLISON BURROUGHS, ESQUIRE  
21 and  
22 ARNOLD GORDON, ESQUIRE  
23 Assistant United States Attorneys  
24  
25

1 Q. And was Sam Brown a member of the JBM?

2 A. Yes, he is.

3 Q. ~~Later in 1986, did you and Bucky have a~~  
4 ~~meeting with Aaron Jones at a house in West~~  
5 ~~Philadelphia?~~ C.C.E. "Organizer"

6 A. ~~Yes, we did.~~

7 Q. ~~In addition to you and Bucky and Aaron~~  
8 ~~Jones, was James Cole also at this meeting?~~

9 A. Yes. *✓ Rehearsed B.S.*

10 Q. *highlighted* Was the purpose of this meeting for Bucky  
11 Davis to tell Aaron Jones that Sam Brown was  
12 charging the two of you too much for the cocaine  
13 you were getting from him?

14 A. Yes.

15 Q. Was Aaron Jones upset about the fact that  
16 Sam Brown or "Magic" was charging you so much?

17 A. Yes, he was.

18 Q. Beginning a couple of months after this  
19 meeting at approximately the end of 1986 or the  
20 beginning of 1987, did you and Bucky begin getting  
21 your cocaine directly through Aaron Jones?

22 A. Yes.

23 Q. When you wanted cocaine would you or Bucky  
24 call Aaron Jones and tell him that you wanted to  
25 see him?



Carson - Direct

1 meaning, Leroy Davis, we should not be charged that high a  
2 price we being family and he didn't want to go down from the  
3 price that he was giving the cocaine to us for so we took the  
4 conversation to someone higher than them in the organization to  
5 Aaron Jones and we met with Aaron Jones pertaining to that.

6 Q Who was at that meeting with Aaron Jones? *See Grand Jury!*

7 A It was me, Leroy Davis and Aaron Jones. *testified, Cole!*

8 Q Where did that meeting take place?

9 A Aaron Jones's mother's house. *Said a house/no specific G.J.*

10 Q What was decided at the meeting?

11 A It was decided that we would start receiving the cocaine  
12 directly from Aaron Jones.

13 Q Did someone arrive at Aaron's mother's house during or  
14 right after that meeting???

15 A Yes. *the fact*

*"Rehearsed"*

16 Q Who was that?

17 A James Cole. *Live! See G.J., he said Cole at meeting!*

18 Q What happened after Cole arrived? *Placing Cole in the conspiracy, and organizer.*

19 A Well, upon them pulling up to the house, Aaron recognized  
20 him pulling up to the house. *more than one, who!* He informed us that James is here

21 to meet with -- to meet with me, meaning Aaron, about him  
22 wanting us to cool out because things are getting too hot as  
23 far as our drug business. Things is moving too fast and  
24 getting too hot for the organization.

25 Q After this meeting with Aaron how would you and Bucky get

*Said James NICKNAME WAS FAT BOY!*

*Do Not Know Cole.*

*J.C.*

only

1988


1 and he sees Goldie, Goldie at the mall, Goldie, the other  
2 person in 125-I, Goldie, the person whose house was searched in  
3 January of 1988, Goldie who is supposed to get the 14 kilograms  
4 from James Price. He sees Goldie and Goldie tells him Aaron  
5 wants to get in touch with him and so forth and Aaron then says  
6 he's unhappy with James Cole. James Cole is pulling all kind  
7 of sneaky shit and, in fact, Aaron says he paid James Cole all  
8 the money. Earl says I'm short on the money. I haven't been  
9 paid all of it and Aaron says he paid him all the money so we  
10 go -- There's a discussion with Goldie. Goldie sets up a  
11 meeting with Aaron and then they meet with Aaron.

12 Now after that there are 100, 150 and 200 and 30  
13 kilograms of cocaine delivered.

14 What does Frog, Rodney Carson, have to say? He says  
15 when he first joined that James Cole was the leader and  
16 distributor and that Aaron Jones was getting his cocaine from  
17 James Cole.

18 He said that Aaron Jones and James Cole delivered to  
19 others in addition to Rodney Carson, others who had different  
20 areas of the city: Sam brown, Basil, that's Leonard Patterson,  
21 Kevin Bowman, Bernard Fields, Reggie Reaves and that they were  
22 selling cocaine just as Bucky Davis and Frog were selling  
23 cocaine.

24 On one occasion Leroy Davis, Frog, Rodney Carson, and  
25 Aaron Jones were having a meeting. James Cole arrived but they



1 didn't meet with James Cole.

2 Ladies and gentlemen of the jury, assuming that ~~that~~  
3 Rodney Carson was not telling the truth, wouldn't it have been  
4 much easier for him to have said: Oh, yes, we all had a meeting  
5 together; James Cole was there, Aaron Jones was there; we had a  
6 big discussion.

7 <sup>putting Cole in the conspiracy!</sup>  
No, ladies and gentlemen of the jury, he testified  
8 they weren't there at the meeting but according to Aaron Jones,  
9 he said that Cole was there to meet because he was upset, he  
10 wanted people to cool things off. There was too much heat  
11 coming down on the JBM and the chairman of the board, the  
12 insulated fellow, James Cole, the supplier, the connect, the  
13 guy that was above that didn't want to expose himself to being  
14 caught, the smart guy; he wanted people to cool it because he  
15 didn't want all this heat down. He didn't want to get caught  
16 but, ladies and gentlemen of the jury, I submit this  
17 prosecution shows that he was caught.

18 Now also there's testimony that there was a later  
19 meeting in early 1988, a meeting at Fayette Street and the  
20 members of the JBM were there and Aaron Jones said that James  
21 Cole wanted to cool it. He was going to go out to California <sup>BS</sup>  
22 and he wanted to cool it and basically James Cole was not going  
23 to be there any more as the connect.

24 Now Carson also testified that in 1990, James Cole  
25 returned and at that point in time "Q", Bernard Fields, one of

Early  
1988

89

Rebuttal Allison Burroughs

1 Rodney Carson, Dave Baynham all the others when he assumed  
2 leadership of the drug trafficking organization known as the  
3 Junior Black Mafia or the JBM.

4 Although some of our witnesses are not the most  
5 upstanding citizens and you may in fact consider them to be the  
6 offensive immoral people I believe that's how Mr. Trigiani  
7 referred to them we haven't made any bones about that ladies  
8 and gentlemen. We are not attempting to put these people  
9 forward as the people we would most like to have at our house  
10 or your house for dinner but these people do have at least two  
11 things going for them when you evaluate their credibility.

12 The first thing is that they made a commitment to  
13 tell the truth when they signed their plea agreements or  
14 accepted their immunity. And the second is that so much of  
15 what each witness said was corroborated by what other witnesses  
16 said or by the recorded conversations or by the physical  
17 evidence like the guns seized from James Cole.

18 Let's talk about motivation to tell the truth and I  
19 want to read a couple paragraphs from the plea agreement. The  
20 one I'm going to read from is Rodney Carson. I'm going to  
21 paraphrase Paragraph 4 is Government Exhibit 2. (Read).

22 Paragraph 17. (Read).

23 Paragraph 18. (Read).

24 Similarly ladies and gentlemen, each of the immunity  
25 agreements that you heard about in this case I have Marco



Burroughs/Rebuttal

90

1 Lopez's in my hand this also provides if a witness doesn't  
 2 testify truthfully the Government has the right to use whatever  
 3 it is they said against them in a later criminal proceeding and  
 4 that includes prosecuting them for all the crimes for which  
 5 they received immunity in this agreement and there's also a  
 6 paragraph in this agreement virtually the same agreement as in  
 7 Rodney Carson's Paragraph 6. (Read).

8 Well, we all know ladies and gentlemen that to a  
 9 certain extent people generally and the people that testified  
 10 as witnesses in this case are often motivated by their own  
 11 self-interests. What the provisions in the immunity agreement

12 do is give each and every cooperating witness a powerful  
 13 personal incentive to tell the truth because they know if they  
 14 don't tell the truth it's then they can be prosecuted not only  
 15 for whatever role they may have played but also for perjury or  
 16 for any other crimes they may have told the Government about  
 17 during the course of their cooperation.

18 Can you trust these people to tell the truth the  
 19 question Mr. Trigiani asked you. Well, we are not asking you  
 20 to unconditionally accept the uncorroborated testimony of any  
 21 witness. You may be rightfully skeptical about finding that  
 22 the word of anyone of these people would be sufficient to  
 23 establish guilt beyond a reasonable doubt but in this case you  
 24 heard the testimony of numerous witnesses and what they said  
 25 was corroborated the testimony of each other and that testimony

Rebuttal

1 doesn't make you guilty of anything.

2 Once again in Mr. Trigiani's closing you heard about  
3 the organizational charts prepared by Rodney Carson and Chris  
4 Anderson. Some what surprising to hear about those charts  
5 again since the witnesses explained so clearly why Cole didn't  
6 appear but to reiterate Rodney Carson told you his particular  
7 chart reflected a particular moment in time 1988-1989 and if  
8 you look at that chart which I believe the defendant marked as  
9 an exhibit you'll see it includes individuals that became a  
10 part of the JBM during that get down lay down thing people that  
11 became involved with the organization after James Cole stepped  
12 back because he thought the thing was getting too high profile.

13 Likewise Chris Anderson told you his chart was made  
14 in preparation for a prior proceeding that did not involve  
15 James Cole prepared during the time that Cole was a fugitive.

16 *dead peoples*  
*dead people on chart.*  
Now ladies and gentlemen, James Cole is not a stupid

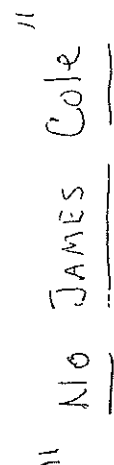
17 man. In fact I submit to you that the evidence in this case  
18 showed that he was rather clever. He backed away from the JBM  
19 when it got too high profile backed away when ~~to~~ ~~to~~  
20 started with the get down and lay down campaign when ~~to~~  
21 ~~to~~ got the rings with the initials JBM started appearing on  
22 cars. *A*

23 You also heard from Marco Lopez about how James was  
24 so paranoid this meeting in the hotel took place in a hotel  
25 bathroom. That testimony by Lopez was corroborated by one of

*A*  
Aaron Jones,

*both  
witnesses  
no  
incident*

Chief Witness  
Rodney Carson



7018 0040 0000 2736 6086

July 6, 2018

James Cole

Reg No. 41167-066

FCI Atlanta

P.O. Box 150160

Atlanta, Ga. 30315

Clerk

U.S. Courthouse

615 Market Sts.

Phila. Pa. 19106

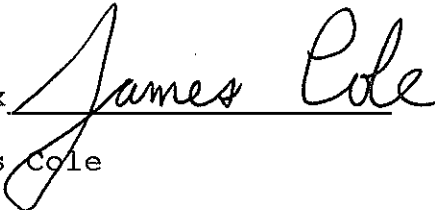
Re: Restrain/Injunction  
Relief].

Dear Clerk

Would you please hand this one up. I cannot be sure however I want to bring this to your attention, because I believed that this moght be a related case, in the matter of **Aaron Jones v. Commonwealth**, Case [unknown], in front of **Honorable Savage** where Mr Jones has pending litigation.

This is for your information.

Thanks in this matter.

x 

James Cole